

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Mitchell Ryan

Plaintiff,

v.

Civil Action No. 4:21-cv-01075-P

Grapevine-Colleyville Independent School
District and Jorge Rodriguez in his official
capacity as GCISD School Board President

Defendants.

Plaintiff's Unopposed Motion for Leave to Proceed Without Local Counsel

Comes Now Plaintiff Mitchell Ryan and files this unopposed motion for leave to proceed without local counsel pursuant to L.R. 83.10.

Plaintiff's counsel has conferred with counsel for Defendants and the Defendants are unopposed to the grant of this motion.

Plaintiff's counsel maintains his principal office in Williamson County, Texas, located two hours and forty minutes from the Court. Plaintiff's counsel is available and willing to travel to Tarrant County as necessary to attend hearings and other local matters. Any local counsel assigned to the case would likely be superfluous as Plaintiff's counsel intends to be present for any hearing or other proceeding in this case. Plaintiff's counsel has represented clients in the Northern District before without local counsel upon grant of leave and is familiar with the Local Rules.

Requiring Plaintiff to identify and retain local counsel would impose a significant and unnecessary financial hardship on Plaintiff. Additionally, because this matter involves a public interest client filing suit against a local government and a local government official, Plaintiff expects that it may be difficult to locate an additional attorney.

Accordingly, Plaintiff moves for leave pursuant to L.R. 83.10 in order to proceed without local counsel. If this Motion is denied, Plaintiff requests up to 14 days following denial of the motion in order to attempt to locate and secure local counsel who is willing to participate on Plaintiff's behalf in this matter.

Respectfully submitted,

The Law Offices of Tony McDonald

By: /s/ Tony McDonald

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Counsel for Plaintiff

Dated September 22, 2021

Certificate of Conference

On September 22, 2021, I conferred with counsel for Defendants over email who stated that Defendants do not oppose this motion.

Certificate of Service

I certify that on September 22, 2021, I electronically submitted the forgoing document with the Clerk of the Court for the U.S. District Court for the Northern District of Texas, using the CM/ECF system of the Court. The electronic case filing system sent “Notice of Electronic Filing” to individuals who have consented in writing to accept this notice of service by electronic means.

I also certify that I sent a copy of this document to counsel for Defendants by electronic mail:

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September 22, 2021

/s/ Tony K McDonald
Tony K McDonald
Counsel for Plaintiff